

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Chapter 11
)	
Squirrels Research Labs LLC <i>et al.</i> , ¹)	Case No. 21-61491
)	<i>(Request for Joint Administration Pending)</i>
Debtors.)	
)	Judge Russ Kendig

**NOTICE OF EXPEDITED HEARING ON CERTAIN
FIRST DAY MOTIONS OF DEBTORS AND DEBTORS-IN-POSSESSION**

PLEASE TAKE NOTICE THAT, on November 23, 2021, the above-captioned Debtors and Debtors-in-Possession (each a “Debtor” and collectively, the “Debtors”) commenced their bankruptcy cases by filing voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”).

PLEASE TAKE FURTHER NOTICE THAT, on **December 1, 2021 at 2:00 p.m., Eastern Time**, the Honorable Russ Kendig, United States Bankruptcy Judge, will conduct an expedited hearing (the “Hearing”) **telephonically** in the Bankruptcy Courtroom at the Ralph Regula Federal Building and U.S. Courthouse, 401 McKinley Ave SW, Canton, Ohio 44702, **Dial In: (888) 684-8852; Access Code: 3303949#**,² with respect to the following first day motions (collectively, the “First Day Motions”) filed by the Debtors:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

² For further details on telephonic participation, please refer to Judge Kendig’s Notice of Telephonic Hearing Procedure, dated March 18, 2020, at <https://www.ohnb.uscourts.gov/sites/default/files/memoranda/telephonic-hearing-procedure-31820.pdf>

<u>Motion Or Application</u>	<u>Nature of Relief Requested</u>
Motion of Debtors and Debtors-in-Possession For Joint Administration of Chapter 11 Cases Pursuant To Bankruptcy Rule 1015(b)	Order Granting Motion of Debtors and Debtors-in-Possession For Joint Administration of Chapter 11 Cases Pursuant To Bankruptcy Rule 1015(b)
Motion of Debtors for Interim and Final Orders: (I) Authorizing the Midwest Data Company LLC to Obtain Debtor in Possession Financing; (II) Modifying the Automatic Stay; (III) Approving DIP Loan and Security Agreement with Instantiation LLC; (IV) Setting Final Hearing; and (V) Granting Related Relief	Interim Order: (I) Authorizing Secured Postpetition Financing on a Superpriority Basis Pursuant to Section 364 of the Bankruptcy Code; (II) Modifying the Automatic Stay; and (III) Granting Related Relief
Motion of Debtors and Debtors-In-Possession For Interim and Final Orders: (A) Prohibiting Utilities From Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtors on Account of Prepetition Invoices; (B) Determining That the Utilities are Adequately Assured of Future Payment; and (C) Establishing Procedures For Determining Requests For Additional Assurance	Order (A) Prohibiting Utilities From Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtors on Account of Prepetition Invoices; (B) Determining That the Utilities are Adequately Assured of Future Payment; and (C) Establishing Procedures For Determining Requests For Additional Assurance

Copies of the First Day Motions can be obtained (a) through the United States Bankruptcy Court's PACER System; or (b) by contacting Marc B. Merklin or Julie K. Zurn via (i) email at mmerklin@brouse.com or jzurn@brouse.com; (ii) telephone at 330.535.5711; or (iii) facsimile at 330.253.8601.

PLEASE TAKE FURTHER NOTICE THAT, if you do not want the Court to grant the relief requested in a Motion, or if you want the Court to consider your views on a Motion, then you or your attorney must attend the Hearing.

Dated: November 24, 2021

Respectfully submitted,

/s/ Julie K. Zurn

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